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19
20 *Proposed Co-Lead Counsel for Movant Arman Anvari and the Class*

21
22 **UNITED STATES DISTRICT COURT**
23
24 **NORTHERN DISTRICT OF CALIFORNIA**

25 BRUCE MACDONALD, Individually and on
26 Behalf of All Others Similarly Situated,

27 Plaintiff,
28 v.

29 DYNAMIC LEDGER SOLUTIONS, INC., a
30 Delaware corporation, TEZOS STIFTUNG, a
31 Swiss Foundation, KATHLEEN BREITMAN,
32 an Individual, ARTHUR BREITMAN, an
33 Individual, TIMOTHY COOK DRAPER, an
34 Individual, DRAPER ASSOCIATES, JOHANN

Case No. 3:17-cv-07095-RS

35
36 **DECLARATION OF HUNG G. TA IN
37 OPPOSITION TO COMPETING
38 MOTIONS FOR LEAD PLAINTIFF AND
39 APPROVAL OF COUNSEL**

40
41 **CLASS ACTION**

1 GEVERS, DIEGO PONZ, GUIDO
2 SCHMITZKRUMMACHER, BITCOIN
3 SUISSE AG, NIKLAS NIKOLAJSEN, and
4 DOES1-100, INCLUSIVE,

Judge: Hon. Richard Seeborg
Courtroom: 3, 17TH Floor

5 Defendants.

6 GGCC, LLC, an Illinois Limited Liability
7 Company, Individually and on Behalf of All
8 Others Similarly Situated,

Case No. 3:17-cv-06779-RS

9 Plaintiff,

10 v.

11 DYNAMIC LEDGER SOLUTIONS, INC., a
12 Delaware corporation, TEZOS STIFTUNG, a
13 Swiss Foundation, KATHLEEN BREITMAN,
14 an Individual, ARTHUR BREITMAN,

15 Defendants.

16 ANDREW OKUSKO, individually and on
17 behalf of all others similarly situated,

Case No: 3:17-cv-06829-RS

18 Plaintiff,

19 v.

20 DYNAMIC LEDGER SOLUTIONS, INC.,
21 THE TEZOS FOUNDATION, KATHLEEN
22 BREITMAN, ARTHUR BREITMAN, and
23 TIMOTHY DRAPER,

24 Defendants.

25 ANDREW BAKER, individually and on behalf
26 of all others similarly situated,

Case No. 3:17-cv-06850-RS

27 Plaintiff,

28 v.

29 DYNAMIC LEDGER SOLUTIONS, INC., a
30 Delaware corporation, TEZOS STIFTUNG, a
31 Swiss Foundation, KATHLEEN BREITMAN,
32 an Individual, ARTHUR BREITMAN, an
33 Individual, JOHANN GEVERS, an individual,
34 STRANGE BREW STRATEGIES, LLC, a
35 California limited liability company, and DOES
36 1 through 100 inclusive,

37 Defendant.

1 I, Hung G. Ta, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC, proposed Lead Counsel for
 3 the putative class in the above-captioned action (the “Action”) and counsel to proposed Lead Plaintiff
 4 Arman Anvari. I am an active member in good standing of the bar of the State of New York and will
 5 apply to be admitted *pro hac vice* in this matter. I submit this declaration in support of Arman
 6 Anvari’s Opposition to Competing Motions For Appointment as Lead Plaintiff and Approval of
 7 Counsel.

8 2. On February 4 and 6, 2018, I conferred via telephone with Mr. William Restis of the
 9 Restis Law Firm, P.C. and Messrs. Joseph DePalma and Jeremy Nash of Lite DePalma Greenberg,
 10 LLC, counsel for plaintiffs GGCC LLC, Pumaro LLC, and Nick Anthony (the “GGCC Group”).

11 3. During the calls, we discussed the legal and procedural dynamics at issue at this stage
 12 of the proceedings, and exchanged our respective views on how the Action should be prosecuted.

13 4. The discussions revealed a concurrence of views between our respective clients and
 14 our firms concerning the prosecution of the Action. Counsel for the GGCC Group offered to work
 15 collaboratively with my firm in prosecuting the Action as the need may arise. Counsel for the GGCC
 16 Group also explained that Pumaro LLC, a Bitcoin purchaser and Nick Anthony, a subminimum
 17 investor, are ready to be included as additional named class representatives if the need arises.

18 5. I have conferred with my client, Mr. Arman Anvari, and he is in agreement with this
 19 collaborative approach.

20 6. Pursuant to Local Rule 3-7(c), Mr. Anvari has reviewed the allegations set forth in the
 21 pending, first-filed Complaint (Dkt. No. 1 in *GGCC, LLC v. Dynamic Ledger Solutions, Inc.*, No.
 22 3:17-cv-06779-RS) and intends to adopt the substance of its allegations. However, Mr. Anvari
 23 reserves the right to amend the Complaint if appointed Lead Plaintiff.

24 7. Attached as Exhibit A is the Company Extract of Trigon Trading Pty. Ltd., obtained
 25 from the Australian Securities & Investments Commission.

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1 I declare under penalty of perjury that the foregoing is true and correct, this 8th day of
2 February 2018.

3 _____/s/ *Hung G. Ta*
4 Hung G. Ta
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